

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
FILED
IN CLERKS OFFICE

2005 FEB -4 P 4: 58

United States of America,

v.

Bruce Gordon Hill.

U.S. DISTRICT COURT
DISTRICT OF MASS.

Cr. No. 03-10344-DPW

MOTION TO QUASH OR OTHERWISE MODIFY SUBPOENA

Pursuant to F.R. Cr. P. 17(c)(2), Wilmer Cutler Pickering Hale and Dorr ("Wilmer Hale") moves to quash or otherwise modify the subpoena served on it to produce documents on February 10, 2005 in the above action, on the grounds that said subpoena is overbroad, and compliance would be unreasonable and oppressive. Furthermore, the subpoena calls for the production of documents privileged under the attorney-client privilege or protected by the work product doctrine.

Wilmer Hale and the defendant are in continuing discussions about the scope and content of the subpoena and the documents Wilmer Hale are able to produce. Thus far, however, the parties have been unable to resolve the issues of (1) the unreasonable burden placed on Wilmer Hale and its client by the overbreadth of the subpoena, and (2) the request for documents that are privileged, or protected by the work product doctrine. Absent resolution of these issues, a brief memorandum in support of this Motion will be filed prior to the return date of the subpoena.

For these reasons Wilmer Hale respectfully moves that said subpoena be quashed or otherwise modified so that compliance is not unreasonable or oppressive.

WILMER CUTLER PICKERING HALE AND DORR LLP

By its attorneys,



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Dated: February 4, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the
above document was served upon the
attorney of record for each other party
by mail and on February 4, 2005.

Maureen N. Wilmer